

UNITED STATES DISTRICT COURT  
for the  
District of Vermont

In the Matter of the Search of )  
(Briefly describe the property to be searched )  
or identify the person by name and address )  
U.S. Priority Mail Express parcel number ) Case No. 2:20-mj-72  
9470 1368 9523 2590 4040 89 )  
)

**SEARCH AND SEIZURE WARRANT**

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the \_\_\_\_\_ District of \_\_\_\_\_ Vermont  
(identify the person or describe the property to be searched and give its location):

See Attachment A.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B, describing items constituting or leading to evidence of violations of 21 U.S.C. §§ 841(a)(1), 843(b), and 846.

**YOU ARE COMMANDED** to execute this warrant on or before February 16, 2021 (not to exceed 14 days)  
 in the daytime 6:00 a.m. to 10:00 p.m.  at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Hon. John M. Conroy  
(United States Magistrate Judge)

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

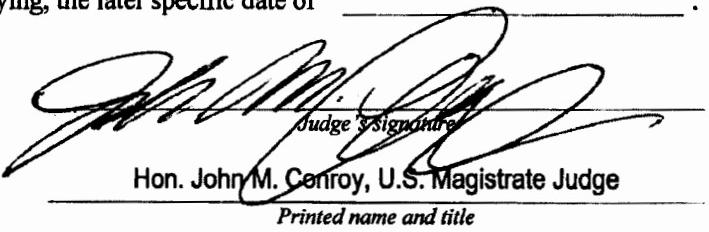
for 30 days (not to exceed 30)  until, the facts justifying, the later specific date of \_\_\_\_\_.

Date and time issued:

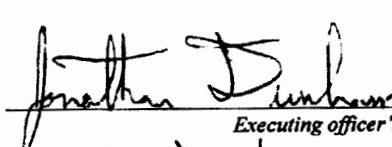
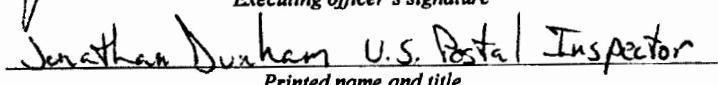
Feb. 2, 2021  
11:05

City and state:

Burlington, Vermont

  
Judge's Signature  
Hon. John M. Conroy, U.S. Magistrate Judge  
Printed name and title

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

Return		
Case No.: 2:20-mj-72	Date and time warrant executed: 2/2/21 11:49 AM	Copy of warrant and inventory left with: Lindsay Mignott
Inventory made in the presence of: Ashley Hamilton		
Inventory of the property taken and name of any person(s) seized: 2.5 grams of a light brown powder substance consistent with heroin		
Certification		
<p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p> <p>Date: 2/2/21</p> <p> _____ _____ <small>Jonathan Dunham</small></p> <p><small>Executing officer's signature</small></p> <p> _____ <small>Printed name and title</small></p> <p><small>U.S. Postal Inspector</small></p>		

**ATTACHMENT A**

Item to be Searched:

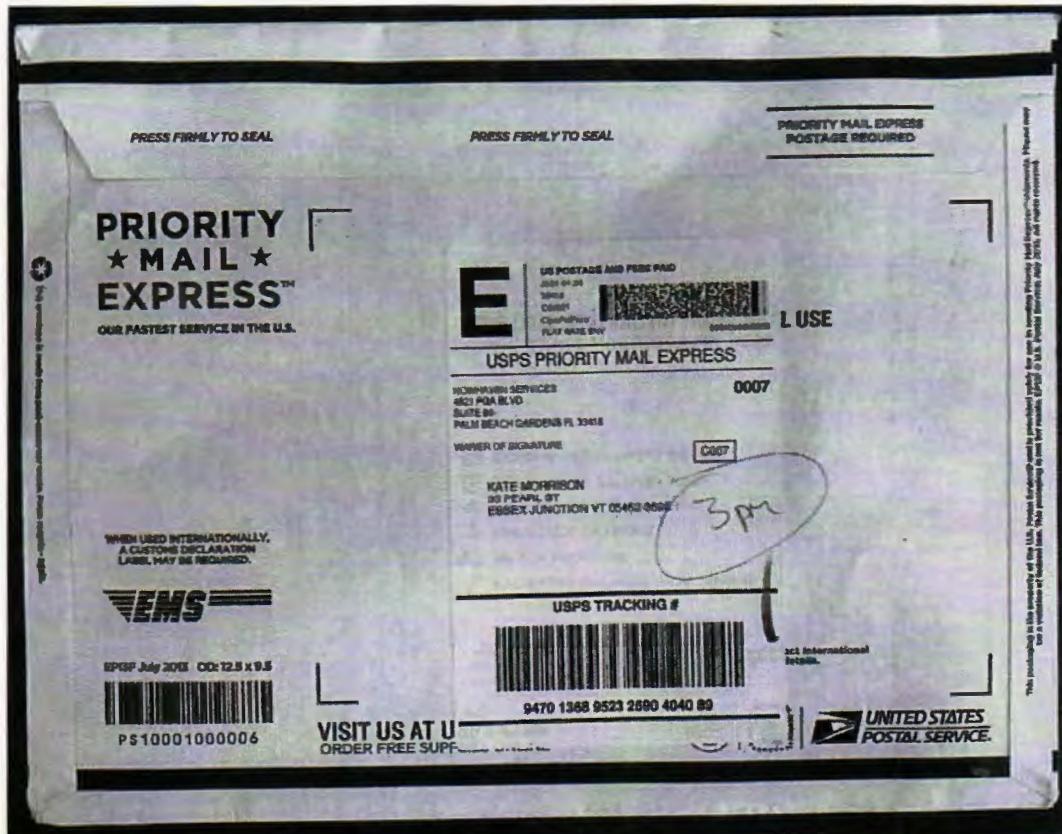
**Subject Parcel:** The following Priority Mail Express parcel, presently in the possession of the U.S. Postal Inspection Service at 8 New England Drive, Essex Junction, VT 05452:

Priority Mail Parcel Number: 9470 1368 9523 2590 4040 89

Sender Name and Address: Nowhaven Services  
4521 PGA Blvd.  
Suite 80  
Palm Beach Gardens, FL 33418

Recipient Name and Address: Kate Morrison  
35 Pearl St.  
Essex Junction, VT 05452-3690

Parcel Weight: 4 ounces



**ATTACHMENT B**

**ITEMS TO BE SEIZED**

Any and all evidence and/or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), 843(b) and 846, knowing or intentional distribution of controlled substances, possession with intent to distribute controlled substances, use of a communication facility (including the mails) to facilitate the distribution of a controlled substance, and conspiracy to possess with intent to distribute and to distribute controlled substances, including the following:

- a. Controlled substances, substances suspected to be controlled substances, drug processing and packaging material, cutting agents, and drug paraphernalia and literature;
- b. Any and all documents, records and articles of personal property evidencing the obtaining, secreting, transfer, expenditure, and concealment of money and assets derived from or to be used in the purchase, and distribution of controlled substances, including the following: U.S. currency, foreign currency, jewelry, bank statements, receipts, electronics, financial and negotiable instruments, checks, money orders, records of wire transfers, and tax records.

**AFFIDAVIT**

I, Jonathan Dunham, after being duly sworn, depose and state as follows:

**INTRODUCTION AND BACKGROUND**

1. I am a Postal Inspector employed by the U.S. Postal Inspection Service (USPIS) and assigned to the Boston Division. The Boston Division has responsibility for USPIS investigations in Massachusetts, New York, Vermont, Connecticut, New Hampshire, Maine, and Rhode Island. I have been employed by the Inspection Service since April 2017, and I am currently assigned to the Burlington, Vermont Domicile.

2. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), in that I am empowered by law to conduct investigations and to make arrests for federal offenses.

3. My training and experience includes a Bachelor of Science degree in Criminal Justice, a Bachelor of Arts degree in Psychology, a certificate in Homeland Security, and a Master's degree in Criminal Justice from Westfield State University; Postal Inspector Basic Training at Potomac, Maryland; and Postal Inspector Post-Basic Training at Burlington, Vermont. During the course of my employment with the USPIS, I have conducted or participated in criminal investigations, including incidents where the U.S. Mail was used for the purpose of possessing with intent to distribute, distributing, and conspiring to possess with intent to distribute and to distribute, controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), 843(b) and 846.

4. During my work on this case, I have reviewed reports prepared by other investigators regarding other investigative efforts. In addition, I have discussed this investigation with other agents and officers involved in the case. As a result of my personal participation in

this investigation, through my conversations with other investigators and agents, and my analysis of reports prepared for this investigation, I am familiar with aspects of this investigation. I submit this affidavit based upon my personal knowledge derived from my participation in this investigation and upon information that I have received from a variety of other sources. This affidavit does not contain all of the information gathered during this investigation; rather it contains information that I believe is sufficient to support my request. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for the search warrant, it does not set forth every fact that I or others have learned during the course of this investigation.

**ITEMS TO BE SEARCHED**

5. I submit this affidavit in support of an application for a warrant to search the following parcel (hereinafter referred to as the Subject Parcel):
  - a. U.S. Priority Mail Express parcel number **9470 1368 9523 2590 4040 89** mailed to "KATE MORRISON, 35 PEARL ST, ESSEX JUNCTION VT 05452-3690" from sender "NOWHAVEN SERVICES, 4521 PGA BLVD, SUITE 80, PALM BEACH GARDENS FL 33418" ("Subject Parcel"). The Subject Parcel's listed weight is 4 ounces and is further described in Attachment A.

**PROBABLE CAUSE**

6. On June 4, 2020, I received from this Court a warrant to search a parcel addressed to "Andrew Morrison, 35 Pearl Street, Essex Junction, VT 05452-3690." A copy of the Search Warrant and Affidavit is attached to this Application and incorporated by reference in this Affidavit. *See* Exhibit 1 (No. 2:20-mj-72). As Exhibit 1 explained, 35 Pearl Street, Essex Junction, VT 05452-3690, appeared to be associated with illegal shipments of controlled

substances. *See id.* ¶ 6. The parcel listed in Exhibit 1 was searched, and found to contain 3.5 grams of a tan powder substance that field tested positive for heroin, which is a schedule I controlled substance.

7. Exhibit 1 further explained that multiple parcels sent to Andrew Morrison, 35 Pearl Street, Essex Junction, VT 05452, were linked to a USPIS controlled substance investigation in Houston, Texas. On February 28, 2020, I contacted Inspector Benjamin Whitsitt in the Houston, Texas division of USPIS. Inspector Whitsitt informed me that his investigation involved suspects' use of the U.S. mail system to ship heroin, methamphetamine, and crack cocaine to addresses throughout the United States. Based on my consultation with Inspector Whitsitt on June 4, 2020, I learned that as part of their investigation, USPIS executed a search warrant at a residence in Texas. USPIS recovered heroin, cocaine and methamphetamine during that search warrant. Investigators also recovered a ledger that listed Andrew Morrison as a purchaser of heroin, cocaine, and methamphetamine in October and November 2019. Inspector Whitsitt informed me that 35 Pearl Street, Essex Junction, VT regularly received shipments from the suspect(s) in his Texas investigation. Postal Service records indicated that 35 Pearl Street, Essex Junction, VT has received 93 parcels in the past year. Those records also indicated 42 of the 93 parcels originated from Texas.

8. On June 10, 2020, I received from this Court another warrant to search a parcel addressed to "Andrew Morrison, 35 Pearl Street, Essex Junction, VT 05452-3690." A copy of the Search Warrant and Affidavit is attached to this Application and incorporated by reference in this Affidavit. *See Exhibit 2 (No. 2:20-mj-72).* As Exhibit 2 explained, 35 Pearl Street, Essex Junction, VT 05452-3690, appeared to be associated with illegal shipments of controlled

substances. *See id.* ¶ 6. The parcel listed in Exhibit 2 was searched, and found to contain 2.5 grams of a tan powder substance that field tested positive for heroin.

9. On August 18, 2020, Homeland Security Investigations (HSI) Special Agent Paul Altenburg and I performed a Knock and Talk at 35 Pearl Street Apt 2, Essex Junction, VT 05452. The purpose of the Knock and Talk was to interview Andrew Morrison regarding the shipments of controlled substances, and seek cooperation in the investigation. Andrew Morrison did not wish to cooperate. Andrew Morrison did not give consent to law enforcement to open the parcel referenced in Exhibit 3 listed below.

10. On August 19, 2020, I received from this Court a warrant to search a parcel addressed to "Andrew Morrison, 28 Vermont Ave, Colchester, VT 05446-3125." A copy of the Search Warrant and Affidavit is attached to this Application and incorporated by reference in this Affidavit. *See Exhibit 3 (No. 2:20-mj-72).* As Exhibit 3 explained, 28 Vermont Ave, Colchester, VT 05446-3125, appeared to be associated with illegal shipments of controlled substances. *See id.* ¶ 9. The parcel listed in Exhibit 3 was searched, and found to contain 4.0 grams of a tan powder substance that field tested positive for heroin.

11. On November 17, 2020, I received an email from an Essex Junction post office employee. The employee stated the following: "the neighbors at 33 Pearl St Apt A and B are all of sudden receiving a large amount of express mail which they never used to receive. [REDACTED] said when [he/she] delivers the express packages to 33 Pearl A & B, there is always a guy outside in the yard and usually when [he/she] is leaving, the guy goes straight to mailbox but only takes the express packages and never grabs the mail."

12. On November 23, 2020, I retrieved a priority mail parcel from my office mailbox. The parcel was addressed to "Kristin Miller/Jon Dunham", from "Postmaster Essex Junction, VT

05452-9998". I opened the parcel and discovered an open Priority Mail Express parcel, EJ 496 154 165 US addressed to "Wilhemenia Kirk, 33A Pearl St., Essex Junction, VT 05452" from "Tyler Reed 400 S Hall St, Dallas, TX 75226." The parcel had a note attached that read "Customer doesn't know sender. Suspicious contents white powder inside a pouch". I requested Inspector Kristin Miller be present during the remainder of the search. I discovered 3.5 grams of a light brown powdery substance consistent with heroin inside a small heat sealed baggie. I cut open the baggie to field test the substance. The substance field tested positive for heroin. I sealed the baggie before placing it in an evidence bag.

13. On November 25, 2020, an employee at the Essex Junction post office informed me that they received the above mentioned parcel on November 21, 2020 from an employee at the Pearl Street post office in Essex Junction, VT. The Pearl Street post office employee reported that a customer brought the opened parcel in and said they had no idea who it came from, but they found a white powdery substance inside.

14. On December 16, 2020, I was contacted by an employee at the Essex Junction, VT post office. The employee identified two parcels addressed to Wilhemenia Kirk, 33 Pearl St. Apt A, Essex Junction, VT 05452. The first Priority Mail parcel 9405 5368 9784 6415 2241 52 had a return address from "Barbie Johnson, 104-21 47th Ave, Corona, NY 11368". The second parcel 9374 8897 5600 9045 7173 08 was from "Amazon Fulfillment Services, 172 Trade Street, Lexington, KY 40511".

15. On December 16, 2020, I parked my undercover law enforcement vehicle at 32 Pearl Street, Essex Junction, VT 05452. I had a clear, and unobstructed view of 33, and 35 Pearl Street, Essex Junction, VT 05452. The purpose of the surveillance was to watch the carrier deliver the parcels. At 10:32 AM I used binoculars to watch Kate Morrison walk two dogs back

to her residence, and enter 35 Pearl Street Apt. 2, Essex Junction, VT. I was able to clearly identify Kate Morrison based on photos of her. At 10:50 AM Andrew Morrison returned home, parked his red pickup truck in the driveway and entered 35 Pearl Street Apt 2, Essex Junction, VT. At 11:27 AM a United States Postal Service (USPS) carrier on a walking route, delivered the parcels, along with other mail, to the uppermost mail slot intended for Apartment A, attached to 33 Pearl Street, Essex Junction, VT 05452. The carrier then walked to 35 Pearl Street Apt 2, Essex Junction, VT and delivered mail. At 11:30 AM Kate Morrison exited 35 Pearl Street Apt 2, Essex Junction, VT and walked to the mail slot attached to 33 Pearl Street Apt A, Essex Junction, VT. I saw Kate Morrison remove both parcels from the mail slot intended for 33 Pearl Street Apt A. Kate Morrison examined both parcels and placed the Amazon parcel back into the mail slot for 33 Pearl Street Apt A, Essex Junction, VT. Kate Morrison slipped Priority Mail parcel 9405 5368 9784 6415 2241 52 under her jacket and walked back to 35 Pearl Street Apt 2, Essex Junction, VT. The surveillance operation concluded after Kate Morrison entered 35 Pearl Street Apt 2, Essex Junction, VT with the Parcel addressed to "Wilhemenia Kirk, 33 Pearl St. Apt A, Essex Junction, VT 05452" from "Barbie Johnson, 104-21 47th Ave, Corona, NY 11368".

16. On January 5, 2020, I identified a Priority Mail Express parcel 9405 5368 9784 6415 2241 52 addressed to "Dustin Seguin, 33 Pearl St. Apt B, Essex Junction, VT 05452-4159" from "Chance Stinger, 1830 Peralta Way, Hanford, CA 93230". The Priority Mail Express parcel was located by employees at the Essex Junction, Vermont post office upon my request. The Subject Parcel was scheduled for delivery that same day.

17. On January 5, 2020, I parked my undercover law enforcement vehicle at 32 Pearl Street, Essex Junction, VT 05452. I had a clear, and unobstructed view of 33, and 35 Pearl

Street, Essex Junction, VT 05452. The purpose of the surveillance was to watch the carrier deliver the parcel. At 9:47 AM I noticed a red Chevy Silverado truck with VT license plate 114A989 parked in the drive way. I witnessed Andrew Morrison driving the same truck on December 16, 2020, during a previous surveillance operation. At 9:59 AM I used binoculars to watch Kate Morrison walk out of 35 Pearl Street Apt. 2, Essex Junction, VT and collect the mail from the mail slot near her door. Kate Morrison then entered her residence and shut the door. At 10:18 AM a United States Postal Service (USPS) carrier on a walking route, delivered the parcel to the mail slot intended for Apartment B, attached to 33 Pearl Street, Essex Junction, VT 05452. The mail slot was second from the top slot. The carrier then walked to 35 Pearl Street Apt 2, Essex Junction, VT and delivered mail. At 10:19 AM Kate Morrison exited 35 Pearl Street Apt 2, Essex Junction, VT and walked to the mail slot attached to 33 Pearl Street Apt B, Essex Junction, VT. Kate Morrison removed the parcel intended for 33 Pearl Street Apt B. Kate Morrison carried the parcel back to 35 Pearl Street Apt 2, Essex Junction, VT. The surveillance operation concluded after Kate Morrison entered 35 Pearl Street Apt 2, Essex Junction, VT with the parcel addressed to “Dustin Seguin, 33 Pearl St. Apt B, Essex Junction, VT 05452-4159” from “Chance Stinger, 1830 Peralta Way, Hanford, CA 93230”.

18. On February 1, 2021, I was contacted by employees at the Essex Junction post office. I requested employees to hold parcels addressed to 35 Pearl St., Essex Junction, VT and contact me before delivery. The same day, I collected the Subject Parcel from the post office, and secured it inside my office located at 8 New England Drive, Essex Junction, VT 05452.

19. The return address 4521 PGA Blvd, Palm Beach Gardens, FL 33418 comes back to a UPS store. Suite 80 does not exist at this address, as listed on the Subject Parcel label.

20. As a Postal Inspector, I have access to law enforcement databases including the Thomson Reuters Consolidated Lead Evaluation and Reporting (“CLEAR”) system. CLEAR is used to locate individuals, businesses and assets by searching, among other things, publicly available information from utility and phone company records, real estate records, certain tax and criminal records, and information provided by credit bureaus. CLEAR collects and aggregates such information such that multiple datasets can be searched at once. According to CLEAR, the system gathers information from government agencies and reputable private suppliers such as credit bureaus; it does not display personal information collected from individuals. CLEAR is searchable using different criteria including names, addresses, telephone numbers and other identifiers or combinations of identifiers.

21. According to my review of information in CLEAR, “Nowhaven Services” does not exist in Palm Beach Gardens, FL. I broadened my search, and according to my review of information in CLEAR, “Nowhaven Services” does not exist in Florida.

22. On February 1, 2021, I met Canine handler Corporal David Dewey at the Colchester Police Department (PD). At that time, Corporal Dewey and his certified controlled substance detection dog, Ozzy, conducted an external sniff of the Subject Parcel. To conduct the sniff, the Subject Parcel was placed in a filing cabinet drawer located in the PD records office. Corporal Dewey and Canine Ozzy were not present during the parcel staging. Corporal Dewey was not privy to where the Subject Parcel was placed. I observed Canine Ozzy perform a free sniff of the area. When Canine Ozzy reached the Subject Parcel, he took a deep intake, sat down, and then laid down next to the drawer where the Subject Parcel was placed. Corporal Dewey informed me that Canine Ozzy had alerted to the Subject Parcel.

23. On April 3, 2019, Canine Ozzy graduated from the Basic Canine Drug Detection School, sponsored by the Vermont Police Academy. Canine Ozzy successfully completed the six-week program and has been certified by the Vermont Criminal Justice Training Council. Canine Ozzy was certified, after his reliability was tested in a controlled setting, to detect the presence of cocaine, crack cocaine, heroin, ecstasy, methamphetamine, and various forms of used drug paraphernalia. In addition, Canine Ozzy was trained to detect the above-mentioned illicit drugs while contained in various packaging and was further able to detect monies tainted/contaminated with one or more of these illicit drugs. Canine Ozzy's standard alert is an increased tail wag, intake of air, then sit when he encounters the presence of the above-mentioned controlled substances. Canine Ozzy's latest re-certification was in December of 2020.

24. Following the positive alert from the external sniff, I retained the Subject Parcel and secured it in my office at 8 New England Drive, Essex Junction, VT 05452.

25. I also know from my training and experience the following:

a. Drug traffickers mailing controlled substances frequently use U.S. Postal Service Priority Mail Express and Priority Mail services to ship unlawful controlled substances, and the recipients of those unlawful drugs often use U.S. Postal Service Priority Mail Express and Priority Mail services to ship the proceeds of the illegal sale of controlled substances. These controlled substances and the proceeds of the illegal sale of controlled substances are often found during parcel investigations and interdictions.

b. Drug traffickers use U.S. Postal Service Priority Mail Express and Priority Mail services because of the reliability of delivery, speed of delivery, low cost, the customer's ability to track the package's shipment online, as well as the low risk of detection by law

enforcement. Shippers using Priority Mail Express and Priority Mail services pay for the benefit of being able to confirm the delivery of the parcel by checking the U.S. Postal Service internet website or calling a toll free number.

c. Drug traffickers who mail controlled substances, and the drug purchasers who send payment in the form of cash or other drugs, often use false or incomplete information in labeling the parcels, as well as dated information. In this way, drug traffickers can distance themselves from the package containing controlled substances or from the proceeds of the sale of the controlled substances in the event the package is intercepted by law enforcement.

d. Drug traffickers who mail controlled substances, and the drug purchasers who send payment in the form of cash or other drugs, will often use post offices located in surrounding cities rather than their post office of delivery, to mail their parcels. In this way, drug traffickers can distance themselves from the package containing controlled substances or from the proceeds of the sale of the controlled substances.

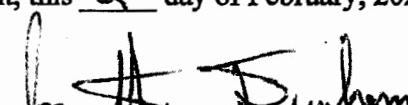
### **CONCLUSION**

26. I respectfully submit that, pursuant to 18 U.S.C. § 3103a(b), there is “reasonable cause to believe that providing immediate notification of the execution of the warrant may have an adverse result.” Providing notice to the anticipated recipients of the Subject Parcel would seriously jeopardize the ongoing investigation. Depending on the results of the search, law enforcement will be considering an undercover delivery of the Subject Parcel, and the possibility of additional search warrants. Disclosure would give subjects of the investigation an opportunity to destroy evidence, change patterns of behavior, notify co-conspirators, conduct financial transactions to hide assets, and/or flee from prosecution.

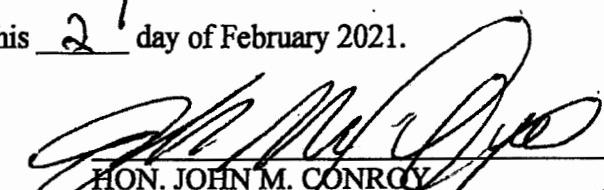
27. It is further requested that the Court authorize execution of this warrant at any time of day or night, as the Subject Parcel is in law enforcement custody.

28. Based on the foregoing, I believe that there is probable cause to search the Subject Parcel for evidence or instrumentalities of violations of 21 U.S.C. §§ 841(a)(1), 843(b) and 846.

Dated at Burlington, in the District of Vermont, this 2 day of February, 2021.

  
\_\_\_\_\_  
JONATHAN DUNHAM  
U.S. Postal Inspector

Subscribed and sworn to before me this 2 day of February 2021.

  
\_\_\_\_\_  
HON. JOHN M. CONROY  
United States Magistrate Judge  
District of Vermont